

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ICBC (LONDON) PLC,

Plaintiff,

-against-

THE BLACKSANDS PACIFIC GROUP, INC.,

Defendant.

15 Civ. 0070 (LAK) (FM)

THE BLACKSANDS PACIFIC GROUP, INC. and
BLACKSANDS PACIFIC ALPHA BLUE, LLC,

Counterclaim-Plaintiffs,

-against-

ICBC (LONDON) PLC,

Counterclaim-Defendant.

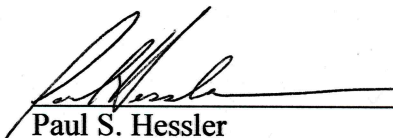
**NOTICE OF COUNTERCLAIM-DEFENDANT'S
MOTION TO DISMISS COUNTERCLAIMS**

PLEASE TAKE NOTICE that upon that upon the accompanying memorandum of law and the declaration of Paul S. Hessler and the exhibits attached thereto, Counterclaim-Defendant ICBC (London) plc respectfully moves this Court, before the Honorable Lewis A. Kaplan, at the United States Courthouse, 500 Pearl Street, Room 21B, New York, New York, on a date to be determined by the Court, for an order pursuant to Federal Rule of Civil Procedure 12(b)(6) dismissing the Counterclaims for failure to state a claim.

Dated: New York, NY
February 13, 2015

Respectfully submitted,

LINKLATERS LLP

By: _____

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